

AB:VJM

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

- against -

THERESA RIDDLE,

Defendant.

**TO BE FILED UNDER SEAL**

COMPLAINT AND AFFIDAVIT  
IN SUPPORT OF APPLICATION  
FOR ARREST WARRANT

(18 U.S.C. § 751(a))

Case No. 23-MJ-151

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EASTERN DISTRICT OF NEW YORK, SS:

IAN KANGAS, being duly sworn, deposes and states that he is a Deputy United States Marshal with the United States Marshals Service, duly appointed according to law and acting as such.

On or about February 1, 2023, within the Eastern District of New York and elsewhere, the defendant THERESA RIDDLE, having been convicted of an offense, did knowingly and intentionally escape from the custody of the Attorney General or his authorized representative.

(Title 18, United States Code, Section 751(a))

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all relevant facts and circumstances of which I am aware.

1. On or about September 19, 2017, the defendant THERESA RIDDLE pleaded guilty in the Eastern District of New York to one count of wire fraud, in violation of Title 18, United States Code, Section 1343, and one count of conspiracy to distribute and possess with intent to distribute heroin, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B) and 846. See United States v. Jane Doe, No. 17-CR-491 (JS) (E.D.N.Y. Sept. 19, 2017). On or about July 23, 2021, the Honorable Joanna Seybert, United States District Judge, sentenced RIDDLE to 72 months' imprisonment and four years of supervised release. See Judgment, United States v. Jane Doe, No. 17-CR-491 (JS) (E.D.N.Y. filed July 29, 2021).

2. On or about January 20, 2023, RIDDLE was transferred from Federal Correctional Institute Aliceville in Aliceville, Alabama, to Brooklyn House, a residential reentry center in Brooklyn, New York. RIDDLE was not scheduled to be released from Brooklyn House until June 16, 2023.

3. On or about February 1, 2023, RIDDLE departed Brooklyn House on pass to visit a Social Security Administration Office. RIDDLE was due back to Brooklyn House at approximately 3:30 p.m. but failed to return as required.

4. Brooklyn House staff attempted unsuccessfully to locate or contact RIDDLE. I have also tried to contact RIDDLE multiple times through a number listed in Brooklyn House records, and she has failed to answer or return my calls.

5. As of the date of the filing of this Complaint, RIDDLE has not returned to Brooklyn House.

6. I respectfully request that this Court issue an order sealing, until further order of the Court, all materials submitted in support of this application, including the

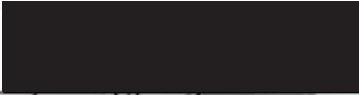
application and arrest warrant. Premature disclosure of these materials would give RIDDLE an opportunity to change patterns of behavior and to continue fleeing from or evading prosecution. Therefore, such disclosure would have a significant and negative impact on the continuing investigation and may severely jeopardize its effectiveness.

WHEREFORE, your deponent respectfully requests that a warrant issue for the arrest of the defendant THERESA RIDDLE so that she may be dealt with according to law.



IAN KANGAS  
Deputy United States Marshal  
United States Marshals Service

Sworn to before me by reliable electronic means telephone  
this 5th day of February, 2023



HONORABLE PEGGY KUO  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK